

ORIGINAL

Approved: Rebecca Dell  
 REBECCA T. DELL  
 Assistant United States Attorney

Before: THE HONORABLE ONA T. WANG  
 United States Magistrate Judge  
 Southern District of New York

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 UNITED STATES OF AMERICA

-v-

ROBERT WILLIAM HALL,

Defendant.

1: 9 MAG 8065  
 1: COMPLAINT

:  
 : Violation of  
 : 18 U.S.C. §§ 2113(a) and  
 : 2  
 :  
 : COUNTY OF OFFENSE:  
 : BRONX

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SOUTHERN DISTRICT OF NEW YORK, ss.:

CLIFFORD PARKS, being duly sworn, deposes and says that he is a Detective with the New York Police Department ("NYPD"), and charges as follows:

COUNT ONE  
 (Bank Burglary)

1. On or about September 19, 2019, in the Southern District of New York and elsewhere, ROBERT WILLIAM HALL, the defendant, knowingly did enter and attempt to enter a bank and a building used in whole and in part as a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, with intent to commit in such bank and building and part thereof so used, a felony affecting such bank and in violation of a statute of the United States, and a larceny, to wit, HALL broke into a bank in the vicinity of 641 East Tremont Avenue, Bronx, New York, and attempted to steal money from the vault.

(Title 18, United States Code, Sections 2113(a) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Detective with NYPD and have worked for the NYPD for the past 19 years. I am currently on the Violent Crimes Task Force (the "Task Force") and have been on the Task

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Force for approximately 2 years. I have been personally involved in the investigation of this matter, and I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents and other individuals and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offense cited above, it does not include all the facts that I have learned during the course of the investigation. Where the contents of conversations of others are reported herein, they are reported in substance and in part.

3. Based on my involvement in this investigation, my discussions with other law enforcement officers and other witnesses, my review of documents and other records, and my training and experience, I have learned the following, in substance and in part:

a. On the morning of September 19, 2019, an employee at a branch of Popular Bank ("Bank-1"), located in the vicinity of 641 East Tremont Avenue in the Bronx, New York, reported an attempted burglary of the bank's vault. An initial investigation revealed that an attempted burglar cut a hole in an interior wall inside Bank-1 which led to the bank's vault. That interior wall separated what appears to be a break room and a mechanical room inside Bank-1. Next to the mechanical room appears to be an electrical room. The mechanical room and electrical room are separated by a steel door. The electrical room contains another steel door which leads outside the bank.

b. The investigation also revealed that the lock on the vault had been damaged and that a security guard shirt had been taken.

c. The exterior steel door of the electrical room inside Bank-1 leads to an alcove on the street (the "Alcove"). On the other side of the Alcove is a homeless shelter (the "Shelter"). The Shelter is located in the vicinity of 1974 Hughes Avenue in the Bronx, New York.

4. I and other members of the Task Force have reviewed surveillance footage from Bank-1, the Shelter, and nearby buildings with cameras that point toward the Alcove. This footage depicts the following, in substance and in part:

a. At approximately 3:01 a.m., a man wearing a blue shirt, blue pants, and a white hat entered the Alcove and went inside Bank-1 through the exterior steel door.

b. At approximately 3:23 a.m., the man left Bank-1 and entered the Alcove. He then entered the Shelter.

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c. At approximately 3:37 a.m., a man with a dark-colored hat and the same blue shirt and blue pants left the Shelter. He then returned to the Alcove and re-entered Bank-1. After the man entered Bank-1, the surveillance footage inside the bank was turned off.

d. At approximately 3:57 a.m., the man left Bank-1.

5. Based on my conversations with law enforcement, I have learned, in substance and in part, that the receptionist at the Shelter reviewed the same surveillance footage from Bank-1 and the nearby buildings, and she identified the man in the surveillance footage as ROBERT WILLIAM HALL, the defendant, a resident of the Shelter.

6. Based on my conversations with law enforcement, I have learned, in substance and in part, that, at approximately 1:12 p.m. on September 19, 2019, law enforcement officers arrested ROBERT WILLIAM HALL, the defendant, at the Shelter. At the time of the arrest, HALL was wearing a blue track suit and had dust on his face, which appeared to be from cutting a hole in the interior wall of Bank-1.

7. Based on my conversations with law enforcement, I have learned, in substance and in part, that, at approximately 3:40 p.m. on September 19, 2019, law enforcement conducted an interview of ROBERT WILLIAM HALL, the defendant, who had been advised of and waived his Miranda rights. During the interview, HALL stated, in substance and in part, that:

a. He was the man depicted in the surveillance footage of Bank-1, the Shelter, and the nearby buildings.

b. He forced his way into the exterior and interior steel doors of Bank-1. After going through the interior steel door, he used a pipe found inside the bank to break a hole in the wall which led to the bank's vault. Once he climbed through the hole, he unsuccessfully tried to open the lock on the vault.

c. While inside the bank, he also stole a security guard shirt.

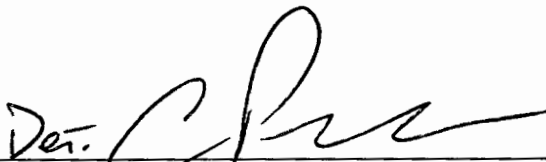
d. After unsuccessfully trying to open the lock on the vault, he exited Bank-1 and returned to the Shelter. He placed the blue shirt and blue pants he wore during the incident in the laundry at the Shelter, which he stated were then stolen.

8. Based on my training and experience, I have learned that Bank-1 is insured by the Federal Deposit Insurance

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Corporation and was so at the time of the above-described attempted burglary.

WHEREFORE, deponent respectfully requests that ROBERT WILLIAM HALL, the defendant, be imprisoned or bailed, as the case may be.



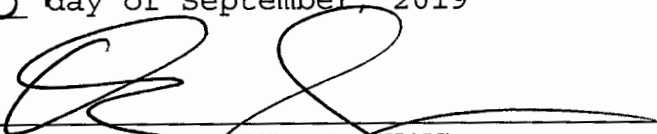
CLIFFORD PARKS

Detective

New York Police Department

Sworn to before me this

20<sup>th</sup> day of September, 2019



THE HONORABLE ONA T. WANG

United States Magistrate Judge

Southern District of New York